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Attorneys for Defendant,  
AMERICAN PRESIDENT LINES, LTD.  
APL LIMITED (S/H/A APL LTD.)  
APL CO. PTE LTD.

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

INDEMNITY INSURANCE COMPANY OF  
NORTH AMERICA,

Plaintiff,

-against-

M/V "HYUNDAI PIONEER," her engines,  
tackle, boilers, etc.; MILLENIUM MARINE  
CORP.; PRESIDENT LINES, LTD., APL LTD.;  
APL CO. PTE LTD.,

Defendants.

07 Civ. 8193 (RWS)

**RULE 7.1 STATEMENT**

I, Lissa D. Schaupp, attorney of record for Defendants American President Lines, Ltd.,  
APL Limited (sued here as APL Ltd.), and APL Co. Pte Ltd. having filed an initial pleading in  
the captioned action, state the following pursuant to Federal Rule of Civil Procedure 7.1:

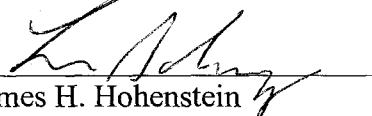
APL Co. Pte Ltd is a wholly-owned subsidiary of APL (Bermuda) Ltd., which is a wholly-owned subsidiary of Neptune Orient Lines, Ltd., which is publicly traded on the Singapore Stock Exchange.

American President Lines, Ltd. is a wholly-owned subsidiary of APL Limited, which is a wholly-owned subsidiary of APL (Bermuda) Ltd. which is a wholly-owned subsidiary of Neptune Orient Lines, Ltd., which is publicly traded on the Singapore Stock Exchange.

APL Limited is a wholly-owned subsidiary of APL (Bermuda) Ltd. which is a wholly-owned subsidiary of Neptune Orient Lines, Ltd., which is publicly traded on the Singapore Stock Exchange.

Dated: New York, New York  
October 25, 2007

HOLLAND & KNIGHT LLP

By:   
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